

Baker & Hostetler LLP

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Nicholas J. Cremona

Presentment Date: August 16, 2017

Time: 12:00 p.m.

Objections Due: August 16, 2017

Time: 11:00 a.m.

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**NOTICE OF PRESENTMENT OF TRUSTEE'S APPLICATION FOR AN
ORDER APPROVING THE RETENTION OF THE SCALETTA LAW FIRM, PLLC
AS SPECIAL COUNSEL NUNC PRO TUNC AS OF AUGUST 1, 2017**

PLEASE TAKE NOTICE that Irving H. Picard, as trustee (the "Trustee") for the liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* ("SIPA"), and the substantively consolidated estate of Bernard L. Madoff, by the Trustee's undersigned counsel, will present the an order approving the retention of The Scaletta Law Firm, PLLC as special counsel *nunc pro tunc* as of August 1, 2017, a copy of which is annexed hereto as Exhibit B (the

“Order”), to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for signature
on **August 16, 2017 at 12:00 p.m.**

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Order
 (“Objections”), shall (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy
 Procedure, Local Bankruptcy Rules and General Orders; (iii) specify the name of the objecting
 party and state with specificity the basis of the objection(s) and the specific grounds therefore;
 (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy
 Court for the Southern District of New York, with a proof of service, and a courtesy copy
 delivered to the Chambers of the Honorable Stuart M. Bernstein, One Bowling Green, New
 York, New York 10004; and (v) be served upon (a) Baker & Hostetler LLP, Counsel for the
 Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq., and
 (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington,
 DC 20006-1620, Attn: Kevin H. Bell, Esq., so as to be received no later than **August 16, 2017 at
 11:00 a.m.**

PLEASE TAKE FURTHER NOTICE, that in the event any Objections are timely
 served and filed, the parties will contact the Courtroom Deputy for a hearing date and the
 moving party will notify other parties entitled to receive notice. The moving and objecting
 parties are required to attend the hearing, and failure to attend in person or by counsel may result
 in the relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE, that the ECF docket number to which the filing
 relates shall be included in the upper right hand corner of the caption of all Objections.

PLEASE TAKE FURTHER NOTICE, that if no timely Objections are served or filed
the proposed Order may be signed without a hearing.

Dated: New York, New York
August 8, 2017

By: /s/Nicholas J. Cremona

BAKER & HOSTETLER LLP

45 Rockefeller Plaza

New York, New York 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*